

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:  
UNITED STATES OF AMERICA :  
:  
- v. - : INDICTMENT  
:  
HARBIR PARMAR, : 18 Cr. 877  
:  
Defendant. :  
:  
- - - - - X

COUNT ONE

The Grand Jury charges:

1. From on or about February 21, 2018, through on or about February 22, 2018, in the Southern District of New York and elsewhere, HARBIR PARMAR, the defendant, unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted and carried away and held for random and reward and otherwise, a person when the person was willfully transported in interstate and foreign commerce, and the defendant traveled in interstate or foreign commerce and used the mail or any means, facility or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense, to wit, PARMAR kidnapped a victim in Manhattan, New York and unlawfully transported her to Connecticut.

(Title 18, United States Code, Section 1201.)

COUNT TWO

The Grand Jury further charges:

2. From at least in or about December 2016 through in or about February 2018, in the Southern District of New York and elsewhere, HARBIR PARMAR, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purposes of executing such scheme and artifice, to wit, PARMAR defrauded customers of ridesharing services in Manhattan, New York and elsewhere in the Southern District of New York, of money and did transmit over the internet false information in furtherance of that scheme.

(Title 18, United States Code, Section 1343.)

FORFEITURE ALLEGATION

3. As a result of committing the wire fraud offense charged in Count Two of this Indictment, HARBIR PARMAR, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that

constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

Shula Caron  
FOREPERSON

Geoffrey S. Berman  
GEOFFREY S. BERMAN  
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

HARBIR PARMAR,

Defendant.

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INDICTMENT

18 Cr.

(18 U.S.C. §§ 1201, 1343.)

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GEOFFREY S. BERMAN  
United States Attorney

A TRUE BILL

Shula Canvate  
Foreperson.

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